IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,)
Plaintiff,) Civil Action No. 07 C 7155
and) Judge Norgle
) Magistrate Judge Mason
VALERIE JOHNSON,)
Plaintiff-Intervenor)
)
V.)
RENZENBERGER, INC.)
Defendant.)
	_)

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff U.S. Equal Employment Opportunity Commission ("EEOC"), Plaintiff-Intervenor Valerie Johnson and Defendant Renzenberger, Inc. ("Renzenberger" or "Defendant"), by and through their attorneys, jointly file this Motion for Entry of Consent Decree. In support of their Motion, the parties state the following:

- 1. On December 20, 2007, EEOC filed this action alleging, *inter alia*, that Defendant violated Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e *et seq.* ("Title VII"), and Title I of the Civil Rights Act of 1991, 42 U.S.C. § 1981a, by discriminating against Charging Party Valerie Johnson and a class of female employees by subjecting them to discrimination and harassment because of their sex. On April 29, 2008 Valerie Johnson intervened in the action.
- 2. The parties have reached a settlement of this matter for both monetary and non-monetary relief in the form of a proposed Consent Decree, attached hereto.
- 3. The parties hereby request that the Court grant their Motion and enter the proposed Consent Decree to resolve fully this matter.

Respectfully requested,

/s Jeanne B. Szromba

Jeanne B. Szromba Attorney for Plaintiff Equal Employment Opportunity Commission 500 West Madison Street, Suite 2000 Chicago, IL 60661

Dated: August 18, 2008

/s Clifford R. Perry III Clifford R. Perry III Attorney for Defendant Laner Muchin Dombrow Becker Levin & Tominberg, Ltd. 515 N. State St., Suite 2800 Chicago, IL 60610

/s Ross J. Peters

Ross J. Peters Attorney for Plaintiff-Intervenor The Law Offices of Ross J. Peters, Ltd. 33 North County Street, Suite 402 Waukegan, Illinois 60085